

Compliance Assessment Report

Report ID:
CAR_NRW0036410

This form will report compliance with your permit as determined by an NRW officer

Site	UK Salvage Car Parts Ltd	Permit Ref	BB3190FA		
Operator/Permit holder	UK Salvage Car Parts Ltd				
Regime	Waste Operations				
Date of assessment	26/02/2020	Time in	11:20	Out	11:50
Assessment type	Site Inspection				
Parts of the permit assessed	Permit & operational area				
Lead officer's name	Warwick-Brown, David				
Accompanied by					
Recipient's name/position	Ramin Amhadi/ TCM	Date issued	02/03/2020		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	4.2.2

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Compliance Assessment Report – UK Salvage Car Parts Ltd (EPR-VB3697TS)

Officer David WARWICK-BROWN visited UK Salvage Car Parts Ltd on 26/02/2020 for a routine site inspection. I introduced myself as the new regulatory officer for the site and met with current Site Supervisor Mr Mohammed Fiazan, who showed me around the site. Mr Faizan informed me that the site owner & Technically Competent Manager (TCM) Mr Ramin Amhadi was currently away on vacation and is due back in the coming weeks. The weather was dry and sunny, with a fresh breeze for the duration of the visit.

The site was generally organised and appeared to be well run. However, a **Category 4 breach** has been scored following this inspection in relation to your waste returns – this is explained in more detail in the relevant section below. Further details on breaches can be found within the last page of this report: a C4 breach is described as a non-compliance which has no potential environmental effect.

Site Inspection

The operational area of the site was separated into 3 main sections relating to the different phases of imported End of Life Vehicles (ELV's): un-depolluted vehicles near the site entrance, the building where depollution takes place and depolluted vehicle shells at the far end of the site.

Drainage infrastructure

All areas of the site were covered with an impermeable surface and a sealed drainage system.

Vehicle depollution

ELV's are depolluted undercover within a building. Ramps were placed at both entrances to the garage to minimise the surface run-off of waste liquids into the drainage system. Spill kits were readily available as required.

Waste storage/Fire Prevention & Mitigation

Internal waste components of ELV's such as batteries, oils, liquids and explosive components were all stored in separate labelled containers inside the garage – this part of the operation was very well organised. All engines were stored undercover in sheds just outside of the main garage.

A considerable number of tyres were being stored outside of the building (as shown in image 1 below), next to the un-depolluted vehicles near the site entrance. Although not considered to be a significant risk at this time, a larger quantity of tyres would have the potential to be a fire risk in the future. Mr Faizan informed me that they were planning to build a storage shed for the tyres within the next few months once the weather improves (estimated to be built in May 2020). In order to minimise fire risk at the site, we recommend that the details of this part of your operation is covered within your Fire Prevention & Mitigation Plan (FPMP). It has been determined that NRW do not currently have a copy of your FPMP on

our database.

Action: please provide NRW with a copy of your current FPMP.



Image 1 – storage of tyres close to the site entrance

Spillages

During the inspection it was noted that there were a few minor oil spillages just outside of the garage where depollution takes place. Since the site is engineered to contain waste liquids, we do not consider this to be an environmental risk. However, please ensure that such spillages are kept to a minimum wherever possible.

Paperwork

A copy of your Environmental Management System (EMS) was available in the site office as required. TCM Mr Ramin Amhadi is currently in the process of obtaining the required WAMITAB qualification. Mr Mohammed Faizan informed me he is also about to commence the process of obtaining the required WAMITAB qualification next month.

Action: please provide NRW with a copy of the relevant qualification certificates once they have been obtained.

Waste returns (G4 – reporting & notifications – Permit condition 4.2.2 – Category 4 breach)

Permit condition 4.2.2 of your environmental permit states the following: *'Within one month of the end of each year, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous year'.*

No records of your annual waste returns have been sent to NRW since the issuing of your permit in January 2019. We therefore require the details of your incoming and outgoing wastes for the 2 following periods: January to March 2019, and April 2019 to March 2020. As this issue has not been previously highlighted, a **category 4 breach** is being scored for this non-compliance on this occasion. Please note that a higher scored breach may be scored if this non-compliance continues.

Action: please send NRW the details of waste accepted and removed from your site since the permit was issued in January 2019. Please submit this information using the excel spreadsheet, provided at the

bottom of the following link to NRW's website: <https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/operator-waste-return-and-deadlines-for-returns/?lang=en>

Please send the completed spreadsheet of your waste returns to the following email address: waste.returns@cyfoethnaturiolcymru.gov.uk.

Thank you for taking the time to meet with us at the site on this occasion.

Please contact David Warwick-Brown on 0300 065 3683 or david.warwick-brown@cyfoethnaturiolcymru.gov.uk If you have any issues with this report, and to provide any correspondence as required by this report.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order.

EPR Compliance Assessment Report

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Operator/Permit holder	UK Salvage Car Parts Ltd	Date	26/02/2020

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
G4	C4	Submit missing waste returns	03/04/2020

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.